

1 Eugene P. Ramirez (State Bar No. 134865)
eugene.ramirez@manningkass.com

2 Andrea Kornblau (State Bar No. 291613)
andrea.kornblau@manningkass.com

3 Khouloud Pearson (State Bar No. 323108)
Khouloud.Pearson@manningkass.com

4 **MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

5 801 S. Figueroa St, 15th Floor
Los Angeles, California 90017-3012

6 Telephone: (213) 624-6900

7 Facsimile: (213) 624-6999

8 Attorneys for Defendants CITY OF HEMET,
PATRICK SOBASZEK, and ANDREW REYNOSO

10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION**

13 GEORGE GONZALEZ,

14 Plaintiff,

15 v.

16 STATE OF CALIFORNIA; CITY OF
HEMET; PATRICK SOBASZEK;
17 ANDREW REYNOSO; SEAN IRICK;
and DOES 1-10, inclusive,

18 Defendants.

Case No. 5:25-cv-00331 KK(DTBx)

**DECLARATION OF KHOULOU
PEARSON**

Filed Concurrently with Notice of Joint
Ex Parte Application and Ex Parte
Application for Modification of
Scheduling Order and Trial
Continuance; Proposed Order

Trial Date: May 11, 2026

Action Filed: December 24, 2024

20 I, Khouloud Pearson, declare as follows:

21 1. I am an attorney duly licensed to practice law in the State of California
22 and a partner with Manning & Kass, Ellrod, Ramirez, Trester LLP, counsel of
23 record for Defendants City of Hemet, Corporal Patrick Sobaszek, and Sergeant
24 Andrew Reynoso in this action. If called as a witness, I could and would testify
25 competently to the facts set forth herein based on my personal knowledge and my
26 re-view of the case file.

27 2. Despite multiple requests to schedule Plaintiff George Gonzalez's
28 deposition, Plaintiff has not been made available and is now in custody at the

1 Riverside County Southwest Detention Center on felony charges (Riverside County
2 Superior Court Case No. GH252880003). The City requested, and the Court granted
3 on October 28, 2025, leave to take Plaintiff's deposition while in custody, which
4 must occur on or before November 20, 2025 under the current discovery cut-off
5 deadline. However, the parties are bound by the availability of the prison to
6 complete the deposition. Furthermore, Plaintiff has been repeatedly transferred to
7 different facilities, which has created additional delays in securing his deposition.

8 3. On May 13, 2025, Plaintiff served objections to the City's subpoena,
9 served on May 1, 2025, for Plaintiff's medical records related to treatment from the
10 incident, which has prevented the parties from receiving records directly related to
11 Plaintiff's claimed damages. To date, Plaintiff continues to deny Defendants' access
12 to medical records by way of subpoena, which will require the assist of the court to
13 resolve. The parties are currently in the process of securing an Informal Discovery
14 Conference before the magistrate judge to resolve the matter.

15 I declare under penalty of perjury under the laws of the United States of
16 America that the foregoing is true and correct.

17 Executed on this 4th day of November, 2025, at Los Angeles, California.

18
19
20 Khouloud E. Pearson

21 Khouloud Pearson
22
23
24
25
26
27
28